

July 30, 2001

Ms. Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
445 12th St. SW
Washington DC 20554

Re: Consumer Information Bureau Seeks Additional Comment on the Provision of
Improved Telecommunications Relay Service, CC Docket No. 98-67

Dear Ms. Salas:

I make the following comments concerning WorldCom's Petition for Clarification of the Improved TRS Order and FNPRM where WorldCom seeks clarification whether or not Internet (IP Relay) is eligible for reimbursement from the Interstate TRS Fund.

The Commission notes, on page three of the public notice, DA 01-1555 of June 20, 2001, that "WorldCom states that its IP Relay service provides customers with many benefits, including the ability to make multiple calls simultaneously, make conference calls, and view websites while calling. Eventually, according to WorldCom, IP Relay will allow computer-to-TTY calls without intervention by a CA, and will provide additional features, such as graphics, text, and video. Some of these services may be software-based, and made available through free computer downloads, without need for new hardware." I have the following two comments:

1) If FCC rules that TRS providers who make TRS available via the worldwide Web (IP Relay) can be reimbursed for IP Relay, will WorldCom and other IP Relay providers be allowed to charge the same rate for non-C.A. (communication assistant) intermediated computer-to-TTY calls as for C.A. calls? If the cost of providing the former is significantly less than human-being mediated calls, should not these savings be passed on the TRS providers (who might use these savings for providing TRS Outreach, for example.)

2) Concerning free computer downloads, will the Commission ensure that TRS-related software is available in both the Macintosh and Windows platforms. As a Macintosh user, I request that the Commission mandates that all TRS-related software for IP Relay must be available in the Macintosh and Windows platforms. Nextalk, for example, as I understand it, is the service WorldCom plans to employ to provide voice relay-to-the Internet instant messaging. When I checked <http://www.nextalk.net/download.html> site today, I discovered that their service is available only to those who use the following platforms: Windows 95, Windows 98, Windows ME, Windows NT 4.0, and Windows 2000.

In private correspondence with me, Dana Mulvany wrote that she thinks the ability to make a three-way call using IP relay could benefit some individuals who sometimes use TRS to assist their telephone communication, especially those who use two-line HCO or two-line VCO. She wrote, "I think the ability to bring in the relay service on an ongoing voice call would be very important because this would allow [TRS] to be used when [the voice call user] needed to improve communication. A lot of people don't need relay for the majority of their calls, but need [TRS] only some of the time" She cited the example of a person with a speech disability (PSD) who can be understood most of the time but who occasionally could benefit from the services of STS Relay. Ms. Mulvany explained the configuration for this type of three-way IP Relay assisted call:

1. Use IP Relay to call ones own voice number.
2. Use three-way calling on the voice line to call the other party
3. Connect IP Relay C.A. to the voice call.
4. The person with the speech disability (PSD) would speak and if he or the other party experienced difficulty understanding a word or phrase, the PSD could call in the assistance of the Relay C.A., then type the word or phrase that was not understood to the C.A. who would in turn restate (revoice) the typed word or phrase. The STS C.A. would then step out of the call until requested to assist. Ms. Mulvany suggested that the C.A.'s microphone would be muted during all portions of the call except when the C.A. was required to use his or her voice to facilitate the communication between the two parties.

I support this idea and suggestion and request that the Commission considers mandating provision of the three-way call capability, specifically the ability to connect to IP Relay, of WorldCom and others who provide IP Relay.

RE: voice initiated calls to IP Relay. I request that the Commission require IP Relay to make voice initiation of IP calls available, if initiation of IP Relay calls either over the public switched telephone network or over Internet telephone is technically feasible.

Re: TRS Outreach The Commission seeks comment on the need for an outreach program to inform consumers of the availability of IP Relay — what it should entail, should requirements for IP Relay outreach be different from requirements for other forms of TRS, etc., (page 4 of DA 01-1555). In my opinion the majority of the US citizenry is not aware of TRS, but would benefit from a basic knowledge of TRS. To that end, I urge the Commission to support a national TRS awareness outreach program that includes traditional TRS and IP Relay. It seems illogical to me to inform the public of IP Relay to the exclusion of traditional TRS. What is required is a general knowledge of TRS among US citizens, that is that TRS offers the ability of TTY users to communicate with people who use the traditional telephone, and who can use TRS and how. Since many US households do not presently include IP access, any TRS Outreach program must, in my opinion, include traditional TRS as well as IP Relay.

Thank you for the opportunity to participate in this proceeding,

Katherine Keller
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